

# FRONTIER GROUP

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Office of Enforcement and Compliance Assurance  
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Washington, DC 20460

Ms. Kane,

The Center for Public Interest Research appreciates the opportunity to comment on EPA's Enforcement and Compliance History Online (ECHO) database. We applaud EPA's efforts to increase public access to environmental enforcement and compliance information through ECHO and encourage EPA to continue to improve data quality in the ECHO system.

We commend EPA for:

- The overall effort to make environmental compliance information more accessible.
- Cleaning up data. The Permit Compliance System and other data sources have been plagued by inaccurate data. It appears that considerable time was spent correcting data problems.
- Being clear about good and bad data. The open and honest listing of data quality problems is helpful and improves confidence in the data that is not listed as having specific problems.
- The error correction reporting feature. Providing an easy process for feedback and data correction is essential to proper database maintenance.

We encourage EPA to:

- Spend more time cleaning up sloppy data. Despite the effort already invested, there is still great potential to improve the quality of existing data to make it more reliable.
- Get states to standardize the data collection processes. We strongly support a uniform national procedure that works efficiently and effectively.
- Get states to fulfill their obligations to participate in this process. It is inexcusable that some states continue to fail to properly process compliance data.

**ECHO is an important development in EPA's ability to provide information to the public – an invaluable part of the environmental enforcement process.** A better informed public can safeguard communities from dangerous pollution, increase facility compliance with environmental regulations, and improve government responsiveness.

Citizens have the right to know about pollution being discharged in their communities so that they can protect themselves. Informed citizens can take precautions that save lives. Furthermore, a better informed public will increase dischargers' compliance with environmental regulations. Facilities are less likely to break the law if they know that people are watching.

**We encourage the EPA to continue to improve data quality and accuracy in the ECHO system.** With any major data collection effort, quality and accuracy is always a concern. In the case of ECHO, where data migrates through multiple local, regional, state, and national databases before entering the combined national database, ensuring the quality and accuracy of data is a challenging task. While we applaud EPA's efforts to improve data quality thus far, there is much work to be done.

First, EPA should make sure every state enters all relevant enforcement and compliance data into the federal databases that form ECHO. This should include historical data as well as current data.

Second, EPA should continue to encourage states to standardize their data management systems to improve accuracy and efficiency. With data coming into the ECHO system in different formats and from different jurisdictions, mistakes will be prevalent. EPA would have more control over the quality and accuracy of data and would be able to manage the database more efficiently if states were using the same data management systems.

Finally, EPA should continue to allocate resources to clean up existing data wherever possible. EPA's present safeguards – database analysis, state review of data before publication, and the error correction reporting feature – are all beneficial, but more time is needed to go through the existing data and make corrections where necessary.

Thank you for consideration of our comments.

Respectfully,

Brad Heavner  
Policy Analyst